

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA

**State Farm Fire and Casualty Company**  
as subrogee of Adam and Lyndsey Boeselager

*Plaintiff*

v.

**RoMar Construction Co.**

*Defendant*

**1:24cv00158 CEA SKL**

Jury Demanded

**Plaintiff's Response to  
Defendant's Motion For Protective Order [Document 32]**

As represented in their email to the Court last week (see attached), the parties have conferred and agreed to postpone the depositions at issue in RoMar's Motion for Protective Order. That Motion is thus moot.

Friday, October 18, 2024

Knoxville, Tennessee

Respectfully submitted,

QUIST, FITZPATRICK & JARRARD PLLC

By: /s/ Michael A. Durr

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*Attorney for Plaintiff State Farm*

**Certificate of Service**

On Friday, October 18, 2024 I served this document by electronic mail to the following email addresses:

- Danny Rader  
[danny@mooreradrer.com](mailto:danny@mooreradrer.com)
- Andre Greppin  
[andre@moorerader.com](mailto:andre@moorerader.com)

By: /s/ Michael A. Durr

Michael A. Durr

## Michael A. Durr

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**From:** Michael A. Durr <mdur@qfjlaw.com>  
**Sent:** Friday, October 11, 2024 3:04 PM  
**To:** 'lee\_chambers@tned.uscourts.gov'  
**Cc:** 'Daniel H Rader IV'; 'Andre Greppin'; 'koconnor@qfjlaw.com'  
**Subject:** 1:24-cv-00158-CEA-SKL State Farm Fire and Casualty Company v. RoMar Construction Co

Your Honor:

The parties conferred on Thursday, October 10 (yesterday). We agreed to postpone the RoMar depositions set for later this month and to propose a new Case Management Order which allows RoMar's new counsel some time to learn the case. We will submit a proposal in this regard next week. We have also received and expect to meet the Court's inquiry about subject matter jurisdiction.

Thank you and have a good weekend.

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